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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

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UNITED STATES OF AMERICA, ) No. CR-15-00033 JD (KAW)  
vs. )  
Plaintiff, ) **STIPULATION AND [PROPOSED]**  
LASHUNDRIA HAYES, ) **ORDER TEMPORARILY MODIFYING**  
Defendant. ) **CONDITIONS OF PRETRIAL RELEASE**  
\_\_\_\_\_  
The Honorable Kandis A. Westmore

17 Defendant, LaShundria Hayes, through her counsel, Assistant Federal Public Defender  
18 Angela M. Hansen, and Assistant United States Philip Kopczynski, stipulate and agree that the  
19 Court should modify the conditions of Ms. Hayes' release to allow her to travel to Las Vegas,  
20 Nevada for three days in early September.

21 On January 29, 2015, Ms. Hayes made an initial appearance in the above-captioned case  
22 and she was arraigned on an Indictment charging her with access device fraud and other crimes.  
23 On that same date, the Court released Ms. Hayes on an unsecured bond. Ms. Hayes has been on  
24 pretrial release for nearly eight months without incident.

25 Ms. Hayes respectfully requests that the conditions of her pretrial release be temporarily  
26 modified to allow her to travel out of the district to Las Vegas, Nevada for a family reunion on

1 September 4, 2015 through and including September 7, 2015. Ms. Hayes is driving and will  
2 need also to travel through other districts to arrive at her destination. Her supervising Pretrial  
3 Services Officer, Victoria Gibson, has no objection to this request, and Ms. Hayes plans to  
4 provide Ms. Gibson with the exact address of where she will be staying while out of the district.

5 Government counsel has no objection to this request to temporarily modify Ms. Hayes'  
6 pretrial release. The parties agree that all other conditions of Ms. Hayes' pretrial release shall  
7 remain in effect.

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9 August 19, 2015

/S/  
10 ANGELA M. HANSEN  
Assistant Federal Public Defender

11 August 19, 2015

/S/  
12 PHILIP KOPCZYNSKI  
Special Assistant United States Attorney

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7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9 OAKLAND DIVISION  
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11 UNITED STATES OF AMERICA, ) No. CR-15-00033 JD (KAW)  
12 Plaintiff, )  
13 vs. )  
14 LASHUNDRIA HAYES, )  
15 Defendant. )  
16 \_\_\_\_\_)

**[PROPOSED] ORDER TEMPORARILY  
MODIFYING CONDITIONS OF  
PRETRIAL RELEASE**

**The Honorable Kandis A. Westmore**

17 For the reasons set forth in the stipulation of the parties above, it is ordered that Pretrial  
18 Services is authorized to allow defendant LaShundria Hayes to travel out of the district to Las  
19 Vegas, Nevada, and to travel through the districts on her drive between the Northern District of  
20 California and her destination, on September 4, 2015 through and including September 7, 2015.  
21 All other conditions of Ms. Hayes' pretrial release shall remain in effect.

22  
23 August 19, 2015  
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United States Magistrate Judge

